



## *Charles County Ethics Commission*

Henry Collins, Jr., Chairman  
Stephen P. Fitzgerald, Esquire Vice Chairman  
Natalie Cotton  
Lisa Elliott  
Ralph Patterson

February 24, 2020

Melody Weschler, Clerk

Dear Official/Employee/Member:

Chapter 170 of the Charles County Code of Ethics requires certain officials, employees and members of certain boards and commissions to annually file a Financial Disclosure Statement.

**Form 1** is designed for County Elected Officials, Candidates for County Office, County Administrator, County Attorney, County Department Heads and members of the following boards, which receive stipends: Board of Appeals, Board of Electrical Examiners, Board of License Commissioners and Planning Commission. **Form 2** is designed for qualifying employees as listed in Section 170-6 of the Code and members who volunteer on the remaining boards listed in Section 170-7 of the Code. Regardless of the form completed, members of boards and commissions listed in Section 170-7 of the County Code are required to disclose the information specified in § 170-6(3) only with respect to those interests, gifts, compensated positions and liabilities that may create a conflict, as provided in §170-5 of the Code, between the member's personal interests and the member's official duties.

Attached is the appropriate form. Please read carefully and follow the instructions, answer the questions, type or print legibly, and only fill out the necessary schedules that apply to you. Return the original signed form, along with any attachments, to Charles County Ethics Commission, c/o Melody Weschler, Clerk to the Ethics Commission, 200 Baltimore Street, La Plata, Maryland 20646, **NO LATER THAN APRIL 30, 2020.** Failure to return the signed, completed form by this date will result in such failure being reported to the County Ethics Commission and the Board of County Commissioners. Sanctions may include any or all actions authorized by § 170-10 of the Code including, but not necessarily limited to, removal from employment and/or appointed position.

The Financial Disclosure Statement describes all interests, transactions and matters required to be disclosed by the Ethics Law throughout the annual reporting period. Financial Disclosure is required so that any conflicts of interest that might impact on the conduct of County business are identified and addressed before problems arise. Disclosure statements are made available to the public.

If at any time you may have a question about a conflict of interest, potential conflict of interest, or acceptance of a gift, you may request an advisory opinion from the Charles County Ethics Commission. Submit your written request to the Charles County Ethics Commission, 200 Baltimore Street, La Plata, MD 20646 or via email to [ethicscommission@charlescountymd.org](mailto:ethicscommission@charlescountymd.org).

If you have any questions regarding the financial form please do not hesitate to contact Melody Weschler, Clerk to the Ethics Commission at 301-645-0555 or email at [weschlem@charlescountymd.gov](mailto:weschlem@charlescountymd.gov).

Sincerely,  
Charles Count Ethics Commission

200 Baltimore Street  
LA PLATA, MARYLAND 20646  
(301) 645-0555 OR Metro 870-2260  
TDD 1-800-735-2258 or 7-1-1; FAX: (301) 645-0515

**CHARLES COUNTY ETHICS COMMISSION**

c/o Office of the County Attorney  
200 Baltimore Street  
La Plata, Maryland 20646  
301-645-0555

**FINANCIAL DISCLOSURE STATEMENT – Form 1**

County Elected Officials, Candidate for County Office, County Administrator, County Attorney, County Department Heads, Board of Appeals, Board of Electrical Examiners, and Board of License Commissioners, Planning Commission and Housing Authority Board

**INSTRUCTIONS**

This statement of 13 pages includes all interests and related matters required to be disclosed pursuant to Chapter 170 of the Charles County Code, the Ethics Law, for the calendar year 2019 pertaining to the person filing the statement. The statement consists of this cover sheet together with Schedules A - J. **The Statement must be completely filled out before it will be accepted. Failure to file, or to file a fully completed statement, constitutes a violation of the Charles County Code of Ethics (Ch. 170 of the Charles County Code).**

- **If a section does not apply to you please indicate by marking N/A.**
- **Please type or print legibly, or the form will not be accepted**

**WHEN COMPLETE PLEASE RETURN THE ORIGINAL SIGNED FORM TO:  
MELODY WESCHLER, CLERK, CHARLES COUNTY ETHICS COMMISSION  
200 BALTIMORE AVENUE, LA PLATA, MARYLAND 20646**

**DEFINITIONS**

**"Attributable interest"** means having direct or indirect control over a property or business interest held or owned by a family member or legal entity.

**"Business entity"** means a corporation, general or limited partnership, sole proprietorship, joint venture unincorporated association or firm, institution, trust, Foundation, or other organization, whether or not operated for profit. Business entity does not include a governmental entity.

**"Commission"** means the Charles County Ethics Commission established under §170.04(a) of this County Code.

**"Compensation"** means any money or thing of value, regardless of form, received or to be received by any individual covered by this chapter from an employer for service rendered. For the purposes of §170.08 of the County Code, if lobbying is only a portion of a person's employment, **"compensation"** means a prorated amount based on the time devoted to lobbying compared to the time devoted to other employment duties.

**"County"** means Charles County, Maryland.

**"Doing Business With"** means:

- (1) having or negotiating a contract that involves the commitment, either in a single or combination of transactions, of \$5,000 or more of county government controlled funds; (2) being regulated by or otherwise subject to the authority of the county; or
- (3) being registered as a lobbyist under §170.08 of the County Code.

**"Elected Official"** means any individual who holds an elective office of Charles County. "Elected official" does not include the sheriff, state's attorney, register of wills, or clerk of the court.

**"Employee"** means an individual who is employed by the county. **"Employee"** does not include an elected local official.

**"Employee"** does not include an employee of:

- (a) the offices of the sheriff, state's attorney, register of wills, or clerk of the court;
- (b) the county health department; or
- (c) the county department of social services.

**"Financial Interest"** means:

- (1) ownership of any interest as the result of which the owner has received, within the past 3 years, or is presently receiving, or in the future is entitled to receive, more than \$1,000 per year; or
- (2) ownership, or the ownership of securities of any kind representing or convertible into ownership, of more than 3 percent of a business entity by a county official or employee, or the spouse of an official or employee.

**"Gift"** means the transfer of anything of economic value, regardless of the form, without adequate and lawful consideration. **"Gift"** does not include a political campaign contribution regulated under election law article, annotated code of Maryland, or any other provision of state or local law regulating the conduct of elections or the receipt of political campaign contributions.

**"Immediate Family"** means a spouse and dependent children.

**"Interest"** means a legal or equitable economic interest, whether or not subject to an encumbrance or a condition, that is owned or held, in whole or in part, jointly or severally, directly or indirectly. For purposes

of §170.06 of the County Code, **"interest"** includes any interest held at any time during the reporting period.

**"Interest"** does not include:

- (a) an interest held in the capacity of a personal agent, custodian, fiduciary, personal representative, or trustee, unless the holder has an equitable interest in the subject matter;
- (b) an interest in a time or demand deposit in a financial institution;
- (c) an interest in an insurance policy, endowment policy, or annuity contract under which an insurer promises to pay a fixed amount of money either in a lump sum or periodically for life or a specified period;
- (d) a common trust fund or a trust which forms part of a pension or profit sharing plan which has more than 25 participants and which has been determined by the internal revenue service to be a qualified trust under the internal revenue code; or
- (e) a college savings plan under the internal revenue code.

**"Official"** means an elected official, an employee of the county government, or a person appointed to or employed by the county or any county agency, board, commission, or similar entity: (1) whether or not paid in whole or in part with county government funds; and  
(2) whether or not compensated.

**"Person"** includes an individual or business entity.

**"Qualified Relative"** means a spouse, parent, child, brother, or sister.

## CHARLES COUNTY ETHICS COMMISSION

### FINANCIAL DISCLOSURE STATEMENT – Form 1

**Regular Reporting Period: January 1 through December 31, 2019**

(or, if filing as a candidate in a year prior to the election year, the period ending as of signature date)

(Note: Please print/type **legibly**, or the form will not be accepted)

#### PART I. Identifying Information

<b>First Name</b>	<b>Initial</b>	<b>Last Name</b>
<b>Mailing Address (work or home) (Home address will not be disclosed to the public.)</b>		
<b>Telephone Number (home or work)</b>		<b>Alternate Number (work or cell)</b>
<b>Current Position, Office or Board/Commission Held With Charles County:</b>		

#### Privacy Notice

The Charles County Ethics Law (Ch. 170 of the Charles County Code) requires collection of this information, which will be used primarily for public disclosure and to determine compliance with the Charles County Code. The information may be presented for review or for copying, at public expenses, upon request to any person, including officials of State, local, or Federal government, who, upon presenting proof identification, registers their name and address, along with the name of the person whose statement is being reviewed. The subject has the right to review, correct, and amend the record, and the right to know who has reviewed their disclosure statement.

#### Standards of Conduct

The Charles County Public Ethics Law (Ch. 170 of the Charles County Code) includes standards of conduct applicable to all financial disclosure filers including employees and elected appointed officials. The standards address disqualification from participation, prohibited secondary employment, prohibited ownership interest, misuse of position, prohibited solicitations and acceptance of gifts, misuse of confidential information, post-employment limitations, prohibited dealing with the County, procurement specifications assistance restriction, and other matters. The law provides for exceptions and exemptions under certain circumstances. If you have any questions about the application of the law, please contact the County Ethics Commission.

#### Enforcement Provisions

Failure to file or report information required by Ch. 170.10 of the Charles County Code by due date could subject filer to administrative penalties of up to \$250 and other disciplinary action per Ch. 170.10 including a civil fine of up to \$5,000 per day by the Circuit Court of Charles County, or any other court having proper venue for the purpose of enforcing compliance. Willful and false filing is subject to penalty for perjury.

## PART II. SIGNATURE AND AFFIRMATION

This Financial Disclosure Statement describes all interests and related transactions and matters required to be disclosed by the Charles County Ethics Law, with respect to the period indicated, and pertaining to me.

I have thoroughly reviewed Schedules A through J of this Financial Disclosure Statement and the instructions, and hereby certify under penalty of perjury that the contents of this Financial Disclosure Statement are true, complete, and correct to the best of my knowledge and belief.

\_\_\_\_\_  
**Signature of Person Filing**

\_\_\_\_\_  
**Date:**

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**DURING THE REPORTING PERIOD:**

**PLEASE PRINT/TYPE LEGIBLY.**

**A. I held or controlled, directly or indirectly, an interest in real property located in or outside of Maryland or held a 30% or greater interest in an entity that held real property.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

**If "Yes", complete Schedule A.**

**SCHEDULE A**

**Real Property Interests.** Please report all interests in real property by answering each question below. Include property owned by business entity in which you held a 30% or greater interest. Complete a separate Schedule A for each property you own or paid rent for. *Please note if the holder of your mortgage or other encumbrance is an entity that did business with the County, you must also complete Schedule H with regard to that indebtedness.*

☐ Rent

☐ Own

Physical Address: \_\_\_\_\_

County and State: \_\_\_\_\_

**(Home address will not be disclosed to the public.)**

**If Owned: complete the following:**

1. Is the interest held: ☐ directly by you ☐ attributable to you or ☐ held by an entity in which you own or control 30% or greater (Name entity): \_\_\_\_\_
2. Do you hold the interest ☐ solely or ☐ jointly?  
If held jointly the name(s) of the other owner(s): \_\_\_\_\_

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

3. Are there any legal conditions or encumbrances on the property? ☐ Yes ☐ No  
(Ex.: mortgages, liens, contracts, options, etc.) **If Yes:** What is/are the name(s) of the lender(s), creditor(s), lien holder(s), etc? \_\_\_\_\_  
\_\_\_\_\_
4. What date was the property acquired? \_\_\_\_\_
5. How was the property acquired? (Ex. Purchase, gift, inheritance, etc.) \_\_\_\_\_
6. From whom was the property acquired? (Name of individual/entity from whom you purchased or inherited the property or who gifted the property to you.) \_\_\_\_\_
7. What consideration was given when the property was acquired? (Dollar amount paid, or if you received the property as a gift or inheritance, the fair market value at the time you acquired your interest in the property) \_\_\_\_\_
8. Have you transferred any interest in this property during the reporting period? ☐ Yes ☐ No  
If Yes:  
8a. What percentage did you transfer? \_\_\_\_\_ %  
8b. What consideration did you receive for the interest? \_\_\_\_\_  
8c. To whom did you transfer the interest? \_\_\_\_\_

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**B. I held or controlled, directly or indirectly, an interest in corporations, partnerships, LLCs, and similar entities (regardless of whether they did business with the County).**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

If "Yes", complete Schedule B.

### SCHEDULE B

**Interests in Corporations, Partnerships, LLC.** Please report all interests in any corporation, partnerships, limited liability partnerships (LLP) or limited liability company (LLC) during the reporting period, whether or not the entity did business with the County, including a 30% or greater interest in an entity that owned an interest. Complete a separate Schedule B for each corporation.

1. What is the complete name of the entity? \_\_\_\_\_
2. If corporate stock, does the stock trade on a stock exchange? ☐ Yes ☐ No
3. Is the interest held ☐ directly by you; ☐ attributable to you or ☐ held by an entity in which you own or control 30% or greater (Name entity): \_\_\_\_\_
4. Is the interest in your name alone, or is it held jointly? ☐ Alone ☐ Jointly, if jointly, the percentage of your interest: \_\_\_\_\_%
5. What is the nature of your interest and the dollar value or number of shares? (Stocks, notes, bonds, puts, calls, straddles, purchase options, etc.) If in a non-publicly traded entity or LLP or LLC, report the percentage of ownership.  
Type: \_\_\_\_\_ Value of Shares: \_\_\_\_\_ **or**  
Number of shares \_\_\_\_\_ Percentage of ownership (non-publicly traded): \_\_\_\_\_%
6. Are there any legal conditions or encumbrances on the property? ☐ Yes ☐ No  
(Ex.: mortgages, liens, contracts, options, etc.)  
If Yes: Name the entity holding the encumbrance : \_\_\_\_\_
7. Did you acquire an interest in the entity during the reporting period? ☐ Yes ☐ No

If Yes:

7a. In what month was the interest acquired? \_\_\_\_\_

7b. How was the interest acquired? (Ex. Purchase, gift, will, etc.) \_\_\_\_\_ 7c.

From whom did you acquire the interest in the entity? (If you purchased from a brokerage, the name of the brokerage): \_\_\_\_\_ 7d.

What consideration was given when the interest was acquired? (Dollar amount paid, or if you received the property as a gift or inheritance, the fair market value at the time you acquired your interest in the property) \_\_\_\_\_

8. Have you transferred any interest in this property during the reporting period? ☐ Yes ☐ No

If Yes:

8a. What portion of the interest was transferred? \_\_\_\_\_

8b. What consideration did you received for the interest in the entity? \_\_\_\_\_

8c. To whom did you transfer the interest? \_\_\_\_\_

YOUR NAME: \_\_\_\_\_

REPORTING YEAR: 2019

**C. I held or controlled, directly or indirectly, an interest in a business entity that, to my knowledge, was regulated by, or doing business or negotiating a contract with the County.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

**If "Yes", complete Schedule C.**

### SCHEDULE C

**Interests in Non-Corporate Business Entities Doing Business with the County.** Please report all interest in any non-corporate business (e.g., sole proprietorship) regulated by, or doing business or negotiating a contract with, Charles County. A separate Schedule C will be required for each business entity to be disclosed, or you may attach a summary worksheet.

1. Name and Address of the Principal office of the business entity:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

2. Is the interest held: ☐ directly by you; ☐ attributable to you

3. Do you hold the interest solely or is it jointly held with another? ☐ Solely ☐ Jointly, if jointly, the % of your interest: \_\_\_\_\_% or dollar value of your interest in the entity: \$ \_\_\_\_\_

4. Are there any legal conditions or encumbrances that apply to your interest in the entity (Ex.: mortgages, liens, contracts, options, etc.)

**If Yes:** Name of creditor: \_\_\_\_\_ (Also report on Schedule H)

5. Was any interest acquired during the reporting period? ☐ Yes ☐ No

If yes:

5a. In what month was the interest acquired? \_\_\_\_\_

5b. How was the interest acquired? (Ex. Purchase, gift, will, etc.) \_\_\_\_\_

5c. From whom did you acquire the interest? \_\_\_\_\_

5d. What consideration was given when the interest was acquired? (Dollar amount paid, or if you received the property as a gift or inheritance, the fair market value at the time you acquired your interest in the property) \_\_\_\_\_

6. Have you transferred any interest during the reporting period?

☐ Yes ☐ No

If yes:

6a. What percentage did you transfer \_\_\_\_%

6b. What consideration was given when the interest was acquired? (Dollar amount paid, or if you received the property as a gift or inheritance, the fair market value at the time you acquired your interest in the property) \_\_\_\_\_

6c. To whom did you transfer the interest \_\_\_\_\_

YOUR NAME: \_\_\_\_\_

REPORTING YEAR: 2019

**D. I received gifts from or on behalf of, directly or indirectly, a person or entity that, to my knowledge, was regulated by, or doing business or negotiating a contract with the County or required to register as a lobbyist.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

**If "Yes", complete Schedule D.**

### **SCHEDULE D**

Gifts. Answer each question below. A separate Schedule D will be required for each gift, or you may attach a summary worksheet.

To your knowledge, did you, or someone on your behalf, receive any gift(s), in excess of a value of \$20 or a series of gifts from the same donor with a cumulative value of \$100 or more, from or on behalf of, directly or indirectly, a person or entity who: 1) did business with the County; 2) engaged in an activity that was regulated or controlled by the County; or 3) is registered or required to register before the County under the lobbying section of the Charles County Code?

☐ No

☐ Yes

If Yes:

1. Who gave you the gift? \_\_\_\_\_
2. What was the nature of the gift? (ex. Restaurant meal, event tickets, membership or subscription, etc.) \_\_\_\_\_
3. What was the value of the gift? \_\_\_\_\_
4. If the gift was given to someone else on your behalf, list the identity of the gift recipient.

\_\_\_\_\_  
\_\_\_\_\_

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**E. I or a member of my immediate family was a partner or held an office, directorship, or salaried employment during reporting period in or with a business entity doing business with the County.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

If "Yes", complete Schedule E.

#### SCHEDULE E

**Employment, Officers, Directorships, or Similar positions in Entities doing business with Charles County. Answer each question below. A separate Schedule E will be required for each disclosure, or you may attach a summary worksheet.**

**Did you or any member of your immediate family (spouse or dependent child) have any salaried employment, or hold any office or directorship with, or was a partner or trustee in, or negotiate a contract or have prospective employment with, and entity that did business with Charles County?**

☐ No

☐ Yes

If Yes:

1. What is the name and address of the business entity?

Name: \_\_\_\_\_

Address: \_\_\_\_\_

2. Who was the individual who held the position or interest listed above? ☐ Self ☐ Spouse  
☐ Dependent child

Name of spouse or dependent child: \_\_\_\_\_

3. What is the title of the office you, your spouse or dependent child held? (Ex. Limited partner, director, treasurer, chair of the board of trustees, etc.) \_\_\_\_\_

4. What year did the position begin? \_\_\_\_\_

5. With what County Agency(ies) did the business entity do business? \_\_\_\_\_

6. What was the nature of the business? (Ex. Regulated by your agency, registered under the lobbying law, or involved with sales and contracts with the county).

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**F. A member of my immediate family was employed by the County during reporting period.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

**If “Yes”, complete Schedule F.**

#### **SCHEDULE F**

**Family Members Employed by Charles County Government. Answer each question below. A separate Schedule F will be required for each member of the immediate family who is employed by the County.**

**During the reporting period, were any members of your immediate family (spouse or dependent children) employed by Charles County in any capacity?**

☐ No

☐ Yes

If Yes:

1. What is the relation and name of the immediate family member employed by Charles County?

\_\_\_\_\_

2. What is the title of your immediate family member's positions in the county agency?

\_\_\_\_\_

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**G. I or my spouse received earned income, either as an employee or sole or part owner of a business entity.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

If "Yes", complete Schedule G.

### SCHEDULE G

**Earned Income from Employment and Business Ownership of Filer and Spouse Answer each question below. A separate Schedule G will be required for each member of the immediate family who is employed or owned a business entity, or you may attach a summary worksheet. You must report all of your and your spouse's employers or business, except for employers or businesses doing business with or subject to the county's oversight already reported on Schedule E, or with Charles County Govt., reported on Scheduled F.**

**During the reporting period, did you or your spouse receive any earned income from any entity (other than entities reported on Schedule E or Charles County Government reported on Schedule F)?**

☐ No

☐ Yes

If Yes:

1. If, during the reporting period, you or a member of your immediate family had employment from which you or they earned income, list the relation, name, and address of the employment.

Name: \_\_\_\_\_ Relationship: \_\_\_\_\_

Name of Employer: \_\_\_\_\_

Address: \_\_\_\_\_

2. If, during the reporting period, you or a member of your immediate family wholly or partially owned any business entity from which income was earned, list the relation, name and address of the business entity.

Name: \_\_\_\_\_ Relationship: \_\_\_\_\_

Name of Employer: \_\_\_\_\_

Address: \_\_\_\_\_

**H. I or a member of my immediate family, owed debts (excluding retail credit accounts) during this reporting period to persons doing business with the County (including debts of entities reported on Schedules A, B, & C).**

List of financial institutions that do business with the County:

Banc of America  
Bank of America  
BB&T  
BB&T Capital Markets  
Candor-Fitzgerald  
Capital One Bank  
Community Bank of the Chesapeake  
Huntington National Bank  
Jeffries & Company, Inc.  
M&T Bank  
M&T Bank/Wilmington Trust  
PayPal  
PNC  
PNC Bank (excluding MLGIP)  
PNC Bank (MLGIP only)  
Prudential  
TD Equipment  
US Bank  
Vining Sparks  
Wells Fargo  
WesBanco Bank, Inc. (formerly Old Line Bank)

\_\_\_\_\_ No

\_\_\_\_\_ Yes

If yes, complete Schedule H.

#### **SCHEDULE H**

**Debts Owed to Entities doing business with the County. Answer each question below. A separate Schedule H will be required for each debt disclosed, or you may attach a summary worksheet.**

**During the reporting period, to your knowledge, did you or a member of your immediate family owe a debt (including mortgages but excludes retail credit accounts) to a financial entity that did business with the County? [Note: If on Schedule A, B or C you listed financial entity that did business with the county as the holder of your mortgage or other encumbrance, you must complete Schedule H with regard to that indebtedness.]**

☐ No

☐ Yes

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

If Yes:

1. To whom did you owe the debt? (Include all mortgages. Do not include consumer credit debts.)

\_\_\_\_\_

2. When was the debt incurred? \_\_\_\_\_

3. What are the interest rate and terms of payment of the debt?

Interest Rate: \_\_\_\_\_ Terms: \_\_\_\_\_

4. Did the principal of the debt ☐ increase or ☐ decrease during the reporting period?

5. What was the amount of the debt as of the end of the reporting period? \$ \_\_\_\_\_

6. Was any security or collateral given for the debt? ☐ No ☐ Yes

If Yes: Please state what type of asset or security was given (home, car, boat, etc.): \_\_\_\_\_

7. If this is a transaction in which you were involved but resulted in a debt being owed by your spouse or dependent child, identify your spouse or child and describe the transaction.

\_\_\_\_\_

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**I. I or my spouse is a regulated lobbyist.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

If "Yes", complete Schedule I.

**SCHEDULE I**

**During the reporting period, were you or your spouse engaged as a regulated lobbyist?**

Self:

☐ No

☐ Yes

If yes:

Entity in which you are engaged as a lobbyist: \_\_\_\_\_

Spouse:

☐ No

☐ Yes

If yes:

Entity in which you are engaged as a lobbyist: \_\_\_\_\_

YOUR NAME: \_\_\_\_\_ REPORTING YEAR: 2019

**J. I have included additional information not otherwise disclosed that may create a conflict of interest or the appearance thereof.**

\_\_\_\_\_ No

\_\_\_\_\_ Yes

**If “Yes”, complete Schedule J.**

**SCHEDULE J**

Additional Information. Please use this schedule to report any additional information, not otherwise disclosed, that you wish to disclose.

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